

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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RANDY L. DAVIS, JR.,

Plaintiff,

v.

VALLEY FORGE MILITARY  
ACADEMY AND COLLEGE,

Defendant.

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CIVIL ACTION

Case No.: 2:23-cv-02004

**JOINT STIPULATION**

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**JOINT STIPULATION FOR EXTENSION OF DISCOVERY DEADLINES**

It is hereby **STIPULATED** and **AGREED**, by and between the parties, by and through their undersigned counsel, after meeting at the law offices of Defendant's Counsel on March 28, 2025, that the following fact discovery has, on the undersigned date, been completed:

1. On September 25, 2024, Defendant served verified written answers and document production responses to Plaintiff's initial interrogatories and requests for production of documents.
2. On October 7, 2024, Plaintiff served verified answers to Defendant's requests for admissions.
3. On October 23, 2024, Plaintiff served verified answers to Defendant's initial interrogatories.
4. On November 27, 2024, Plaintiff served document production responses to Defendant's initial requests for production of documents.
5. On December 3, 2024, Plaintiff served written responses to Defendant's initial requests for production of documents.

6. On December 18, 2024, Plaintiff provided an executed HIPAA release authorization in response to Defendant's initial requests for production of documents.

7. On December 20, 2024, Defendant served thirteen (13) subpoenas for third-party records of Plaintiff.

8. As of March 28, 2025, Defendant has received a response to six (6) of the third-party subpoenas having been served and has provided Plaintiff with copies of all records received to date.

9. On March 27 and 28, 2025, Plaintiff appeared for his deposition at the law offices of Defendant's Counsel.

It is further hereby **STIPULATED** and **AGREED**, by and between the parties, by and through their undersigned counsel, after meeting at the law offices of Defendant's Counsel on March 28, 2025, that the following fact discovery has on the undersigned date, *yet to be completed*:

1. Defendant has not received a response to seven (7) of the third-party subpoenas served on December 20, 2024, and does not expect to receive the records responsive to those subpoenas until after the current fact discovery deadline.

2. Plaintiff intends on noticing the deposition of two (2) fact witnesses to be provided by Defendant for April 2, 2025, and at a later date in mid-April to be scheduled by agreement between counsel.

3. As of March 28, 2025, Plaintiff has not appeared for an Independent Medical Examination ("IME"). Counsel for both parties are in the process of coordinating a date for Plaintiff's IME, and do not expect to schedule it until after the current fact discovery deadline.

Based on the foregoing, it is hereby **STIPULATED** and **AGREED**, by and between the parties, by and through their undersigned counsel, that the discovery deadlines established in this

Honorable Court's December 27, 2024, Order are to be extended by thirty (30) days as set forth in the attached proposed Order.

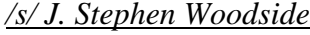
*Respectfully submitted,*

**MARGOLIS EDELSTEIN**

  
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**Date:** March 28, 2025

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**Date:** March 28, 2025